## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

Case No. 1:19-cv-08673-KPF-DCF

DF

DARREN K. INDYKE and RICHARD D. KAHN, in their capacities as the executors of the ESTATE OF JEFFREY E. EPSTEIN.

Defendants.

## JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

- 1. The captioned action is hereby stayed pending Plaintiff's participation in the Epstein Victims' Compensation Program (the "Program").
- 2. Should the Plaintiff cease her participation in the Program for any reason (including but not limited to by declining any monetary settlement offered by the Program), the stay will be lifted within one week (seven calendar days) after Plaintiff provides Defendants with written notice of her intent not to participate in the Program.
- 3. After the lifting of the stay, if any, the Parties will confer on a schedule for the remaining discovery in this action.

Dated: July 29, 2020

New York, New York

Respectfully submitted,

TROUTMAN PEPPER HAMILTON SANDERS LLP

By: /s/ Bennet J. Moskowitz

Bennet J. Moskowitz 875 Third Avenue New York, NY 212.704.6000 Bennet.moskowitz@troutman.com

Attorneys for Darren K. Indyke and D. Richard Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein

KAPLAN HECKER & FINK, LLP

By: /s/ Roberta A. Kaplan

Roberta A. Kaplan Julie E. Fink Kate L. Doniger Alexandra K. Conlon 350 Fifth Avenue, Suite 7110 New York, NY 10118 212.763.0883 rkaplan@kaplanhecker.com jfink@kaplanhecker.com kdoniger@kaplanhecker.com aconlon@kaplanhecker.com

Attorneys for Plaintiff

The parties are directed to submit a joint status report no later than 8/14/2020.

July 29 , 2020 Date:

New York, New York

HON. DEBRA G. FREEMAN

United States Magistrate Judge

Della For